



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/MAA/RMP
F. #2017R05903

271 Cadman Plaza East
Brooklyn, New York 11201

April 4, 2024

By ECF

The Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Judge Donnelly:

The government respectfully submits this letter on behalf of the parties in advance of the status conference later today to jointly propose a briefing schedule for the Court's consideration. The parties will be prepared to discuss the proposed schedule in greater detail and address any question the Court may have at the status conference.

Filing	Proposed due date
Motion(s) concerning protective order and/or Bureau of Industry and Security ("BIS") licenses	May 31, 2024
Government response re: protective order and/or BIS licenses	July 1, 2024
Defense reply re: protective order and/or BIS licenses	July 15, 2024
Motion to sever	September 6, 2024
Government response re: motion to sever	October 4, 2024
Defense reply re: motion to sever	October 18, 2024
Motions to dismiss	November 1, 2024
Motion for bill of particulars	November 12, 2024
Government response re: bill of particulars	December 13, 2024
Defense reply re: bill of particulars	January 10, 2025

Any additional discovery motions	January 24, 2025
Government response to motions to dismiss	January 20, 2025
Government response re: discovery motions	February 24, 2025
Defense reply re: motions to dismiss	February 20, 2025
Defense reply re: discovery motions	March 10, 2025
Any suppression motions as to evidence produced on or before December 31, 2024, including any suppression motions concerning Foreign Intelligence Surveillance Act (“FISA”)	March 3, 2025
Government response to non-FISA suppression motions	April 14, 2025
Defense reply to non-FISA suppression motions	May 5, 2025
Government response to FISA-related suppression motions	June 2, 2025
Defense reply re: FISA-related suppression motions	July 2, 2025

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Respectfully submitted,

BREON PEACE
United States Attorney
Eastern District of New York

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By: /s/ Laura Billings

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Jasmin Salehi Fashami
Trial Attorney

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National Security Division, U.S. Department
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By: /s/ David Lim
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Christian Nauvel
Yifei Zheng
Garrett Coyle
Trial Attorneys

cc: Clerk of the Court (by ECF and Email)
Defense counsel of record (by ECF)